

EXHIBIT A

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BOSTON MUNICIPAL COURT
CENTRAL DIVISION
CIVIL ACTION NO.:

DARRIS GARRAWAY,

Plaintiff,

V.

HIGHLIGHT MOTOR FREIGHT USA, INC

Defendant.

COMPLAINT

Now comes the Plaintiff, Darris Garraway, by and through his attorney and states as follows:

PARTIES

1. The Plaintiff, Darris Garraway, is a natural person residing at 123 Norwell Street, Dorchester, Massachusetts 02124.
2. The Defendant, Highlight Motor Freight Group, Inc. ("Highlight") is a New Jersey corporation with a principal place of business at 14 Eastmans Road, Parsippany-Troy Hills, NJ 07054. Its registered agent for service of process is CPA Professional Services LLC, One University Plaza Ste 102, Hackensack NJ 07601.

FACTS

3. This action arises from a motor vehicle accident between a Tractor Trailer Truck and Bicycle on August 17, 2020 on Massachusetts Avenue and Shirley Street in Boston, Massachusetts 02118.

4. On and prior to August 17, 2020, Massachusetts Avenue and Shirley Street are public roadways in the State of Massachusetts.

5. On August 17, 2020, the Plaintiff was riding his bicycle on Massachusetts Avenue in Boston, Massachusetts.

6. On the same date, Mr. Barys Ilyankou was an employee of Highlight Motor Group operating a Blue Tractor Trailer truck on Massachusetts Avenue in Boston.

7. Prior to the collision, the Plaintiff was riding his bicycle in the right lane on Massachusetts Avenue.

8. The Plaintiff was on an Uber Eats delivery.

9. While the Plaintiff was riding on Massachusetts Avenue in Boston in the right lane, Mr. Ilyankou, without warning suddenly took a right turn onto Shirley Street in front of the Plaintiff, causing the Plaintiff to turn his bicycle in an attempt to avoid a collision with the tractor trailer.

10. The Plaintiff was unable to avoid the tractor trailer and was hit by the tire of the trailer.

11. The Plaintiff was transported via Ambulance from the scene of the collision.

12. The Plaintiff suffered personal injuries as a result of this collision.

COUNT ONE – NEGLIGENCE - RESPONDEAT SUPERIOR
HIGHLIGHT MOTOR FREIGHT USA, INC.

13. Plaintiff realleges and reavers the allegations set forth in paragraph 1 through 13 of this Complaint and incorporates same by reference as if fully stated herein.

14. At the time of the collision, Defendant, Barys Ilyankou, was employed by Highlight Motor Group

15. At the time, the Plaintiff was struck due the negligent operation of Mr. Ilyankou.

16. Mr. Ilyankou was operating the Tractor Trailer Truck within the scope of his employment and for the benefit of Highlight Motor Group

17. The negligent motor vehicle operation can be attributable to his employer, Highlight Motor Group

18. As a direct and proximate result of the negligence and carelessness attributed to the Highlight Motor Group, the Plaintiff:

- a. Suffered serious and painful bodily injuries, great physical pain and mental anguish, and severe and substantial emotional distress;
- b. Was, is, and will be required to undergo medical treatment and to incur medical costs and expenses in order to alleviate injuries, pain, and suffering;
- c. Was, is, and will be precluded from engaging in normal activities and pursuits; and
- d. Otherwise was hurt, injured, and caused to sustain losses.

WHEREFORE, the Plaintiff prays judgment against Highlight Motor Freight USA, Inc. together with damages awarded to the Plaintiff for medical bills and pain and suffering, for interest and attorneys' fees, and for such other and further relief as this Court may deem proper.

THE PLAINTIFF DEMANDS A TRIAL BY JURY ON ALL ISSUES OF FACT.

Date: August 17, 2021

Respectfully submitted the Plaintiff,
through his attorney,

/s/John Bita

John R. Bita, Esq.

BBO # 667886

Kelly & Associates

83 Atlantic Avenue, Suite 202

Boston, MA 02110

(617) 807-0855

john@1800lawguys.com

STATEMENT OF DAMAGES G.L. c. 218, § 19A(a)		DOCKET NO.	Trial Court of Massachusetts
PLAINTIFF(S) Danie Garraway		DATE FILED August 17, 2021	
DEFENDANT(S) Highlight Motor Freight USA, Inc.		COURT DIVISION Central Division, Boston Municipal Court	
INSTRUCTIONS: THIS FORM MUST BE COMPLETED AND FILED WITH THE COMPLAINT OR OTHER INITIAL PLEADING IN ALL DISTRICT AND BOSTON MUNICIPAL COURT CIVIL ACTIONS SEEKING MONEY DAMAGES.			
Required information to be submitted by Filer (select applicable boxes): Civil action alleges money damages in: <input type="checkbox"/> Contract <input checked="" type="checkbox"/> Tort			
TORT CLAIMS		AMOUNT	
A. Documented medical expenses to date:			
1. Total hospital expenses:		\$	
2. Total doctor expenses:		\$	
3. Total chiropractic expenses:		\$	
4. Total physical therapy expenses:		\$	
5. Total other expenses (describe)		\$	
SUBTOTAL:		\$	
B. Documented lost wages and compensation to date:		\$	
C. Documented property damages to date:		\$	
D. Reasonably anticipated future medical and hospital expenses:		\$	
E. Reasonable anticipated lost wages:		\$	
F. Other documented items of damage (describe):		\$	
G. Brief description of Plaintiff's injury, including nature and extent of injury:			
Suffered personal injuries			
For this form, disregard double or treble damage claims; indicate single damages only.		TOTAL: \$ 25,000.00	
CONTRACT CLAIMS		AMOUNT	
<input type="checkbox"/> This action includes a claim involving collection of a debt incurred pursuant to a revolving credit agreement Mass. R. Civ. P. 8.1(a)			
Provide a detailed description of the claim(s):		\$	
.....		\$	
.....		\$	
For this form, disregard double or treble damage claims; indicate single damages only.		TOTAL: \$	
Alleged total damages are (select appropriate box): <input checked="" type="checkbox"/> \$25,000 or less <input type="checkbox"/> more than \$25,000			
ATTORNEY FOR PLAINTIFF (OR UNREPRESENTED PLAINTIFF)		DEFENDANT'S NAME AND ADDRESS:	
/s/ John Bita August 17, 2021		Highlight Motor Freight Group, Inc.	
John R. Bita, III Esq.		14 Eastmans Road	
Signature Kelly & Associates 667886 B.B.O. #		Parsippany-Troy, NJ 07054	
Address 83 Atlantic Avenue, Suite 202, Boston, MA 02110			
CERTIFICATION PURSUANT TO SJC RULE 1:18: I hereby certify that I have complied with requirements of Rule 5 of the Supreme Judicial Court Uniform Rules on Dispute Resolution (SJC Rule 1:18) requiring that I provide my clients with information about court-connected dispute resolution services and discuss with them the advantages and disadvantages of the various methods of dispute resolution.			
Signature of Attorney on Record: /s/ John Bita		Date:	
12/27/19			

EXHIBIT B

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BOSTON MUNICIPAL COURT
CENTRAL DIVISION
CIVIL ACTION NO.:2101 cv 0000949 EF

DARRIS GARRAWAY,

Plaintiff,

v.

HIGHLIGHT MOTOR GROUP, INC

Defendant.

AMENDED COMPLAINT

Now comes the Plaintiff, Darris Garraway, by and through his attorney and states as follows:

PARTIES

1. The Plaintiff, Darris Garraway, is a natural person residing at 123 Norwell Street, Dorchester, Massachusetts 02124.
2. The Defendant, Highlight Motor Group, Inc. (“Highlight”) is an Ontario corporation with a principal place of business at 391 Creditstone Road, Concord, OH L4K 1N8.

FACTS

3. This action arises from a motor vehicle accident between a Tractor Trailer Truck and Bicycle on August 17, 2020 on Massachusetts Avenue and Shirley Street in Boston, Massachusetts 02118.
4. On and prior to August 17, 2020, Massachusetts Avenue and Shirley Street are public roadways in the State of Massachusetts.

5. On August 17, 2020, the Plaintiff was riding his bicycle on Massachusetts Avenue in Boston, Massachusetts.

6. On the same date, Mr. Barys Ilyankou was an employee of Highlight Motor Group operating a Blue Tractor Trailer truck on Massachusetts Avenue in Boston.

7. Prior to the collision, the Plaintiff was riding his bicycle in the right lane on Massachusetts Avenue.

8. The Plaintiff was on an Uber Eats delivery.

9. While the Plaintiff was riding on Massachusetts Avenue in Boston in the right lane, Mr. Ilyankou, without warning suddenly took a right turn onto Shirley Street in front of the Plaintiff, causing the Plaintiff to turn his bicycle in an attempt to avoid a collision with the tractor trailer.

10. The Plaintiff was unable to avoid the tractor trailer and was hit by the tire of the trailer.

11. The Plaintiff was transported via Ambulance from the scene of the collision.

12. The Plaintiff suffered personal injuries as a result of this collision.

COUNT ONE – NEGLIGENCE - RESPONDEAT SUPERIOR
HIGHLIGHT MOTOR FREIGHT USA, INC.

13. Plaintiff realleges and reavers the allegations set forth in paragraph 1 through 13 of this Amended Complaint and incorporates same by reference as if fully stated herein.

14. At the time of the collision, Defendant, Barys Ilyankou, was employed by Highlight Motor Group

15. At the time, the Plaintiff was struck due the negligent operation of Mr. Ilyankou.

16. Mr. Ilyankou was operating the Tractor Trailer Truck within the scope of his employment and for the benefit of Highlight Motor Group

17. The negligent motor vehicle operation can be attributable to his employer,
Highlight Motor Group

18. As a direct and proximate result of the negligence and carelessness attributed to
the Highlight Motor Group, the Plaintiff:

- a. Suffered serious and painful bodily injuries, great physical pain and mental anguish, and severe and substantial emotional distress;
- b. Was, is, and will be required to undergo medical treatment and to incur medical costs and expenses in order to alleviate injuries, pain, and suffering;
- c. Was, is, and will be precluded from engaging in normal activities and pursuits;
and
- d. Otherwise was hurt, injured, and caused to sustain losses.

WHEREFORE, the Plaintiff prays judgment against Highlight Motor Freight USA, Inc.
together with damages awarded to the Plaintiff for medical bills and pain and suffering, for
interest and attorneys' fees, and for such other and further relief as this Court may deem proper.

THE PLAINTIFF DEMANDS A TRIAL BY JURY ON ALL ISSUES OF FACT.

Date: December 28, 2021

Respectfully submitted the Plaintiff,
through his attorney,

/s/ John R. Bitá III
John R. Bitá, Esq.
BBO # 667886
Kelly & Associates
83 Atlantic Avenue, Suite 202
Boston, MA 02110
(617) 807-0855
john@1800lawguys.com

EXHIBIT C

STATEMENT OF DAMAGES G.L. c. 218, § 19A(a)		DOCKET NO.	Trial Court of Massachusetts
PLAINTIFF(s) Darris Garraway		DATE FILED August 17, 2021	
DEFENDANT(s) Highlight Motor Group, Inc.		COURT DIVISION Central Division, Boston Municipal Court	
INSTRUCTIONS: THIS FORM MUST BE COMPLETED AND FILED WITH THE COMPLAINT OR OTHER INITIAL PLEADING IN ALL DISTRICT AND BOSTON MUNICIPAL COURT CIVIL ACTIONS SEEKING MONEY DAMAGES.			
Required information to be submitted by Filer (select applicable boxes): Civil action alleges money damages in: <input type="checkbox"/> Contract <input checked="" type="checkbox"/> Tort			
TORT CLAIMS			AMOUNT
A. Documented medical expenses to date:			
1. Total hospital expenses:			\$ _____
2. Total doctor expenses:			\$ _____
3. Total chiropractic expenses:			\$ _____
4. Total physical therapy expenses:			\$ _____
5. Total other expenses (<i>describe</i>)			\$ _____
SUBTOTAL:			\$ _____
B. Documented lost wages and compensation to date:			\$ _____
C. Documented property damages to date:			\$ _____
D. Reasonably anticipated future medical and hospital expenses:			\$ _____
E. Reasonable anticipated lost wages:			\$ _____
F. Other documented items of damage (<i>describe</i>):			\$ _____
G. Brief description of Plaintiff's injury, including nature and extent of injury:			
Suffered personal injuries.			
For this form, disregard double or treble damage claims; indicate single damages only.			TOTAL: \$ 25,000.00
CONTRACT CLAIMS			AMOUNT
<input type="checkbox"/> This action includes a claim involving collection of a debt incurred pursuant to a revolving credit agreement Mass. R. Civ. P. 8.1(a)			
Provide a detailed description of the claim(s):			\$ _____
.....			\$ _____
.....			\$ _____
For this form, disregard double or treble damage claims; indicate single damages only.			TOTAL: \$ _____
Alleged total damages are (select appropriate box): <input type="checkbox"/> \$25,000 or less <input checked="" type="checkbox"/> more than \$25,000			
ATTORNEY FOR PLAINTIFF (OR UNREPRESENTED PLAINTIFF)		DEFENDANT'S NAME AND ADDRESS:	
/s/John Bita August 17, 2021		Highlight Motor Group, Inc.	
PRINT OR TYPE NAME DATE			
John R. Bita, III, Esq.		391 Creditstone Road	
SIGNATURE			
Kelly & Associates 667886 B.B.O. #		Concord, OH L4K 1N8	
ADDRESS			
83 Atlantic Avenue, Suite 202, Boston, MA 02110			
CERTIFICATION PURSUANT TO SJC RULE 1:18: I hereby certify that I have complied with requirements of Rule 5 of the Supreme Judicial Court Uniform Rules on Dispute Resolution (SJC Rule 1:18) requiring that I provide my clients with information about court-connected dispute resolution services and discuss with them the advantages and disadvantages of the various methods of dispute resolution.			
Signature of Attorney on Record: /s/John Bita			Date: 12/28/21

EXHIBIT D

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

BOSTON MUNICIPAL COURT
CENTRAL DIVISION
DOCKET NO.: 2104CV000949

DARRIS GARRAWAY,

Plaintiff,

v.

HIGHLIGHT MOTOR GROUP, INC.,

Defendant.

DEFENDANT'S REQUESTS FOR ADMISSION

Pursuant to Mass. R. Civ. P. 36, Defendant Highlight Motor Group, Inc. (hereinafter "Defendant") respectfully requests that Plaintiff Darris Garraway (hereinafter "Plaintiff") provide his responses to the following requests for admission:

REQUEST NO. 1: Admit that on or about early November 2021, Plaintiff tripped and fell in a stairwell.

REQUEST NO. 2: Admit that in the trip and fall incident above on or about early November 2021, Plaintiff injured his back and right ankle/leg/foot.

REQUEST NO. 3: Admit that on or about January 14, 2017, Plaintiff was struck by a taxi as a pedestrian.

REQUEST NO. 4: Admit that in the above incident on or about January 14, 2017, Plaintiff injured his right knee.

REQUEST NO. 5: Admit that on or about August 16, 2018, Plaintiff was involved in a tow truck vs. bicycle accident.

REQUEST NO. 6: Admit that in the above incident on or about August 16, 2018, Plaintiff injured his full back, neck, right leg, and right shoulder.

REQUEST NO. 7: Admit that on or about October 05, 2018, Plaintiff was involved in a motor vehicle accident.

REQUEST NO. 8: Admit that in the above incident on or about October 05, 2018, Plaintiff injured his cervical, lumbar, and thoracic regions as well as his left knee.

REQUEST NO. 9: Admit that on or about April 07, 2019, Plaintiff was involved in a motor vehicle accident.

REQUEST NO. 10: Admit that in the above incident on or about April 07, 2019, Plaintiff injured his bilateral shoulders, left wrist, back, right neck, right elbow, and head, and that he further sustained a concussion, altered/blurry vision, constant headaches, and loss of hearing.

REQUEST NO. 11: Admit that Plaintiff has had blurry/altered vision and a diagnosis of optic nerve damage which predates the incident at issue in this matter.

REQUEST NO. 12: Admit that Plaintiff has had issues with altered/blurry vision and loss of hearing prior to the incident at issue in this matter.

REQUEST NO. 13: Admit that Plaintiff has, prior to the incident at issue in this matter, sustained concussions.

REQUEST NO. 14: Admit that on or about April 07, 2019, Plaintiff was referred to a concussion specialist for treatment.

REQUEST NO. 15: Admit that upon arrival to the emergency room at Boston Medical Center on the date the incident at issue in this matter (08/17/2020), Plaintiff told providers he had no loss of consciousness.

REQUEST NO. 16: Admit that Plaintiff did not receive funds from any third-party disability insurers as a result of injuries allegedly sustained in the incident at issue in this matter.

REQUEST NO. 17: Admit that Plaintiff's medical bills in relation to treatment provided for injuries allegedly sustained in the incident at issue in this matter do not exceed \$30,000.00.

REQUEST NO. 18: Admit that Plaintiff did not lose time from work as a result of the incident at issue in this matter.

REQUEST NO. 19: Admit that Plaintiff did not lose wages from work as a result of the incident at issue in this matter.

REQUEST NO. 20: Admit that the amount in controversy in this matter is \$75,000.00 or less.

REQUEST NO. 21: Admit Plaintiff was employed as of September 2021.

REQUEST NO. 22: Admit Plaintiff never required in-home care by any person other than a person he lives with, including but not limited to a caretaker or visiting nurse.

REQUEST NO. 23: Admit that Plaintiff has not made any claim related to this incident with the Massachusetts Department of Industrial Accidents.

REQUEST NO. 24: Admit that Plaintiff was denied SSDI.

DEFENDANT,
By and through counsel,

/s/ Nicole L. Andrescavage, Esq.
Nicole L. Andrescavage, Esq. (BBO #705903)
LEWIS BRISBOIS BISGAARD & SMITH, LLP
One Citizens Plaza, Suite 1120
Providence, RI 02903
Tel: (401) 406-3310
Fax: (401) 406-3312
Nicole.andrescavage@lewisbrisbois.com

CERTIFICATE OF SERVICE

I, Nicole L. Andrescavage, counsel for the Defendant, hereby certify that on this date, July 28, 2022, I served a copy of the foregoing upon all counsel of record via e-mail as follows:

John Bitá, Esq.
Kelly & Associates P.C.
83 Atlantic Avenue, Suite 202
Boston, MA 02110
john@1800lawguys.com

/s/ Nicole L. Andrescavage, Esq.
Nicole L. Andrescavage, Esq.

EXHIBIT E

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

BOSTON MUNICIPAL COURT
CENTRAL DIVISION
DOCKET NO.: 2104CV000949

DARRIS GARRAWAY,

Plaintiff,

v.

HIGHLIGHT MOTOR GROUP, INC.,

Defendant.

PLAINTIFF'S RESPONSES TO DEFENDANT'S REQUESTS FOR ADMISSION

REQUEST NO. 1: Admit that on or about early November 2021, Plaintiff tripped and fell in a stairwell.

RESPONSE: Admit that Plaintiff slipped and fell in a stairwell on that date.

REQUEST NO. 2: Admit that in the trip and fall incident above on or about early November 2021, Plaintiff injured his back and right ankle/leg/foot.

RESPONSE: Admit that Plaintiff recalls injuring his foot but does not recall any other injuries.

REQUEST NO. 3: Admit that on or about January 14, 2017, Plaintiff was struck by a taxi as a pedestrian.

RESPONSE: Admit that Plaintiff was a pedestrian and was tapped by a taxi going at a low rate of speed on that date.

REQUEST NO. 4: Admit that in the above incident on or about January 14, 2017, Plaintiff injured his right knee.

RESPONSE: Plaintiff does not recall injuring his right knee in the accident.

REQUEST NO. 5: Admit that on or about August 16, 2018, Plaintiff was involved in a tow truck vs. bicycle accident.

RESPONSE: Plaintiff does not recall being in an accident with a tow truck.

REQUEST NO. 6: Admit that in the above incident on or about August 16, 2018, Plaintiff injured his full back, neck, right leg, and right shoulder.

RESPONSE: Plaintiff does not recall injuring himself in an accident with a tow truck.

REQUEST NO. 7: Admit that on or about October 05, 2018, Plaintiff was involved in a motor vehicle accident.

RESPONSE: Admit.

REQUEST NO. 8: Admit that in the above incident on or about October 05, 2018, Plaintiff injured his cervical, lumbar, and thoracic regions as well as his left knee.

RESPONSE: Admit.

REQUEST NO. 9: Admit that on or about April 07, 2019, Plaintiff was involved in a motor vehicle accident.

RESPONSE: Admit.

REQUEST NO. 10: Admit that in the above incident on or about April 07, 2019, Plaintiff injured his bilateral shoulders, left wrist, back, right neck, right elbow, and head, and that he further sustained a concussion, altered/blurry vision, constant headaches, and loss of hearing.

RESPONSE: Admit.

REQUEST NO. 11: Admit that Plaintiff has had blurry/altered vision and a diagnosis of optic nerve damage which predates the incident at issue in this matter.

RESPONSE: Admit that Plaintiff suffered blurry/altered vision, but he does not recall a diagnosis of optic nerve damage.

REQUEST NO. 12: Admit that Plaintiff has had issues with altered/blurry vision and loss of hearing prior to the incident at issue in this matter.

RESPONSE: Admit.

REQUEST NO. 13: Admit that Plaintiff has, prior to the incident at issue in this matter, sustained concussions.

RESPONSE: Admit.

REQUEST NO. 14: Admit that on or about April 07, 2019, Plaintiff was referred to a concussion specialist for treatment.

RESPONSE: Plaintiff does not recall being referred to a concussion specialist after being seen in the ER at MGH.

REQUEST NO. 15: Admit that upon arrival to the emergency room at Boston Medical Center on the date the incident at issue in this matter (08/17/2020), Plaintiff told providers he had no loss of consciousness.

RESPONSE: Admit.

REQUEST NO. 16: Admit that Plaintiff did not receive funds from any third-party disability insurers as a result of injuries allegedly sustained in the incident at issue in this matter.

RESPONSE: Admit.

REQUEST NO. 17: Admit that Plaintiff's medical bills in relation to treatment provided for injuries allegedly sustained in the incident at issue in this matter do not exceed \$30,000.00.

RESPONSE: Denied.

REQUEST NO. 18: Admit that Plaintiff did not lose time from work as a result of the incident at issue in this matter.

RESPONSE: Denied, although Plaintiff is not making a claim for lost wages in this matter.

REQUEST NO. 19: Admit that Plaintiff did not lose wages from work as a result of the incident at issue in this matter.

RESPONSE: Denied, although Plaintiff is not making a claim for lost wages in this matter.

REQUEST NO. 20: Admit that the amount in controversy in this matter is \$75,000.00 or less.

RESPONSE: Denied.

REQUEST NO. 21: Admit Plaintiff was employed as of September 2021.

RESPONSE: Admit.

REQUEST NO. 22: Admit Plaintiff never required in-home care by any person other than a person he lives with, including but not limited to a caretaker or visiting nurse.

RESPONSE: Admit.

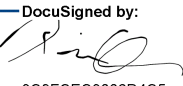
REQUEST NO. 23: Admit that Plaintiff has not made any claim related to this incident with the Massachusetts Department of Industrial Accidents.

RESPONSE: Admit.

REQUEST NO. 24: Admit that Plaintiff was denied SSDI.

RESPONSE: Admit.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY ON 8/17/2022

DocuSigned by:

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Darris Garraway

EXHIBIT F

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DARRIS GARRAWAY,

Plaintiff,

v.

HIGHLIGHT MOTOR GROUP, INC.,

Defendant.

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Case No:

AFFIDAVIT OF NYRON JEALALL

I, Nyron Jealall, under penalties as provided by law pursuant to the Federal Rules of Civil Procedure, certify that the statements set forth herein are true and correct and that, if called upon to testify in the above-captioned case, I could competently testify to the following statements based upon my personal knowledge.

1. I am the Claims Manager of HL Motor Group, Inc. (“Highlight”), a trucking company located in Ontario, Canada.

2. In my position as Claims Manager, I have become familiar with the history, organization and activities of Highlight, a company that is engaged in providing transportation, warehousing and distribution services.

3. Highlight is a company that is organized and existing under the laws of Ontario, Canada and its principal place of business, offices and distribution center are located in Ontario, Canada.

4. In my position as Highlight’s Claims Manager, I am also familiar with its corporate records and documents, which include records of Highlight’s various entities, affiliations, equipment ownership, employees and records related to transportation and delivery.

5. In my position as Highlight's Claims Manager, I am also familiar with the corporate entity known as Highlight Motor Freight USA, Inc. ("Highlight USA"), which is a New Jersey corporation affiliated with but entirely separate and distinct from Highlight.

6. I have reviewed the Complaint in this matter, which generally alleges that plaintiff suffered personal injuries resulting from an August 17, 2020 motor vehicle collision with a vehicle operated by Barys Ilyankou and owned by Highlight.

7. On August 17, 2020, while engaged in the activity described in the Complaint in this matter, Mr. Ilyankou was an employee of Highlight.

8. I reviewed Mr. Ilyankou's employment file and confirmed that he is a citizen of and resides in the State of New York.

9. I also reviewed Highlight's records related to vehicle ownership and found that the vehicle operated by Mr. Ilyankou at the time of the August 17, 2020 motor vehicle accident and described in the plaintiff's Complaint was owned by Highlight.

10. Highlight's records related to vehicle ownership also indicate that the trailer operated by Mr. Ilyankou at the time of the August 17, 2020 motor vehicle accident was owned by Highlight.



Myron Jealall